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August 5, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd Chief Clerk/Executive Director Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, SC 29210

Re: Docket Number: 2011-158-E

Dear Ms. Boyd:

I am writing to inform the Public Service Commission of South Carolina (the "Commission") that Customer Information pertaining to 187 Duke Energy Carolinas, LLC ("DEC") customers and 100 Duke Energy Progress, LLC ("DEP" and together with DEC, the "Companies") customers was disclosed under the following circumstances:

- 1) Guidehouse is a third-party service provider for the Companies' Small Business Energy Saver Program. On June 1, 2021, Guidehouse informed the Companies that it had been impacted by the Accellion File Transfer Appliance Cyberattack in January 2021. An unauthorized person gained access to data stored in Guidehouse's file transfer protocol ("FTP") accounts with Accellion, and the following data elements for the Companies' South Carolina customers were exposed: customer name, facility contact person, facility contact person title, facility contact email, facility contact phone, and account number (collectively, "Customer Information").
- 2) Prior to Guidehouse's notification of the data breach, the Companies in March 2021 began requiring Guidehouse to conduct all communications via the Companies' secure FTP site. In addition, the Accellion FTP site was only exposed for a very limited time during January; accordingly, the exposure of Customer Information was limited to only a single file containing DEC and DEP customer account information, and no future files exchanged with Guidehouse will be at risk to exposure by Accellion.
- 3) The Companies reviewed the situation and determined that notices will be provided to the affected customers informing them that their account number may have been exposed. The notices will also advise the affected customers to be vigilant regarding possible attempts by third

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parties to use that information to perpetrate a scam, for example—a third party impersonating a Duke employee and demanding payment or attempting to acquire personal information from the customer. In addition, the Companies will add a note to the customer's account to monitor for any suspicious activity related to the unintentionally disclosed account numbers. Please note that new account numbers have already been assigned to the affected DEC customers as a result of the implementation of Customer Connect in early April 2021. The DEP customers will receive new account numbers at a later date as Customer Connect is implemented for DEP.

The North Carolina Code of Conduct was approved by the North Carolina Utilities Commission in its September 29, 2016 Order Approving Merger Subject to Regulatory Conditions and Code of Conduct, in Docket Nos. E-2, Sub 1095, E-7, Sub 1100 and G-9, Sub 682. It was further adopted, as applicable to South Carolina, via the Commission's Order No. 2016-772 dated November 2, 2016, and as updated in a filing made on October 9, 2018. The Code of Conduct contains several provisions relating to the disclosure of Customer Information. Customer Information means:

Non-public information or data specific to a Customer or a group of Customers, including, but not limited to, electricity consumption, natural gas consumption, load profile, billing history, or credit history that is or has been obtained or compiled by DEC, DEP or Piedmont in connection with the supplying of Electric Services or Natural Gas Services to that Customer or group of Customers.

If Customer Information is inappropriately disclosed, Section III(A)(2)(k) of the Code of Conduct provides the following:

Should any inappropriate disclosure of DEC, DEP or Piedmont Customer Information occur at any time, DEC, DEP or Piedmont shall promptly file a statement with the Commission describing the circumstances of the disclosure, the Customer Information disclosed, the results of the disclosure, and the steps taken to mitigate the effects of the disclosure and prevent future occurrences.

In addition, Regulatory Condition No. 14.4 provides that such statements should be filed with the Commission(s). Pursuant to this Regulatory Condition and the above-cited provisions of the Code of Conduct, and after recently completing their investigation into the facts, the Companies are filing this letter, in an abundance of caution, to report that Customer Information has been inappropriately disclosed, under the circumstances described above.

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The Companies take their obligation to protect Customer Information very seriously and acted as quickly as possible to rectify this situation.

Sincerely,

Katie M. Brown

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cc: Nanette Edwards, Office of Regulatory Staff
Dawn Hipp, Office of Regulatory Staff
Jeff Nelson, Office of Regulatory Staff
Andrew Bateman, Office of Regulatory Staff